



# **Policy of Equal Opportunity, Non-Discrimination and Anti-Harassment at the Workplace**

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# 1. Introduction

- 1.1. Thoughtworks Technologies (India) Private Limited, ("**Thoughtworks**") is home to all, regardless of age, ethnic origin, sexual orientation, gender, religion, disability, background, or identity. We give people a place to belong, feel safe, respected, and supported to grow and succeed. We endeavour to make Thoughtworks equitable, reflective, and inclusive of the society we live in.
- 1.2. Thoughtworks is an equal opportunity employer. We support each individual employee's right to work in a professional atmosphere that promotes dignity, respect, diversity, safety, and positive regard towards one and all in the workplace.
- 1.3. At Thoughtworks, we work ethically, guided by principles of equity, fairness, and inclusiveness. We do not tolerate bigotry, discrimination, harassment, hostility, or retaliation. We afford equal employment opportunities to all employees and applicants. Discrimination or discriminatory practices and harassment is prohibited in all our workplaces; any such behaviour is unacceptable and will not be tolerated.
- 1.4. This policy, called the ***Policy of Equal Opportunity, Non-Discrimination and Anti-Harassment at the Workplace ("Policy")***, applies to all employees, apprentices, trainees, directors, consultants, contract labour engaged by us, third parties over which we have control, and/or personnel working in our workplaces and on premises. Further, the Policy applies to all aspects of the relationship between us and our employees and/or applicants who apply to work at our various workplace locations.
- 1.5. It is clarified that nothing in this Policy will restrict Thoughtworks from formulating policies relating to recruitment, employment, or promotion of individuals from specific groups (including women or individuals from under-represented minorities) and taking appropriate initiatives to implement such policies with a view towards greater equity and inclusiveness in all workplaces of Thoughtworks. Formulation of such policies and initiatives and their implementation by Thoughtworks and its directors/officers, as well as any such programmes and initiatives currently being implemented at Thoughtworks, will not in any way be considered discriminatory or to be in violation of this Policy. They are, and shall be understood to be, actions taken to equalise opportunity and a proportionate means of achieving the legitimate aim of diversity and inclusion.
- 1.6. It is further clarified that anything not expressly discussed here shall, where the matter relates to equality of opportunity in employment or an instance of discrimination and/or harassment of: (a) a person with disability, as defined by the Rights of Persons with Disabilities Act, 2016 ("**RPWD Act**"), shall be dealt with as per the RPWD Act and the rules made thereunder from time to time ("**RPWD Rules**"), and (b) a transgender person, as defined by the Transgender Persons (Protection of Rights) Act, 2019 ("**TPPR Act**"), shall be dealt with as per the TPPR Act and the rules made thereunder from time to time ("**TPPR Rules**").

## 2. Definitions

- 2.1. **“Discrimination”** includes applying different conditions or standards of employment or work (including but not limited to recruitment, employment, promotion, progression (vertical/lateral), transfer, training, working conditions, pay parity, wages and its administration, employee benefits, and application of policies), to individuals or employees, or directly or indirectly disadvantaging certain individuals or employees, or refusing them employment or promotional opportunities without any reasonable cause or solely on the basis of their gender, gender identity or expression, sexual orientation, age, place of birth, descent, ethnic or national origin, religion, community, caste, race, colour, physical appearance, marital status, pregnancy, disability, or any other characteristic protected by law. Without prejudice to the generality of the foregoing, with regard to persons with disabilities (as defined by the RPWD Act), Discrimination includes denial of reasonable accommodation in working conditions and workplaces, and with regard to transgender persons (as defined by the TPPR Act), includes unfair treatment in, or in relation to, employment.
- 2.2. **“Employee”** means any individual employed, engaged, or retained by Thoughtworks for any work, either directly or through a contractor. For the purposes of this Policy, an Employee shall also include any member of the Board of Directors of Thoughtworks.
- 2.3. **“Harassment”** includes any kind of unwelcome act or behaviour in the Workplace, direct or indirect, obvious or subtle, of a vexatious, disrespectful, offensive, intimidating, humiliating, demeaning, abusive, hostile, oppressive, or derogatory nature. Such unwelcome behaviour may be physical, verbal, or non-verbal. Illustrations of Harassment include being subjected to any Discrimination or discriminatory practice/s, derogatory statements about an individual's gender, gender identity or expression, sexual orientation, age, place of birth, descent, ethnic or national origin, religion, community, caste, race, colour, physical appearance, marital status, pregnancy, disability, or other protected status, as well as microaggressions and bullying by or towards any Employee.

For the purposes of clarity:

- i. If an individual who is subjected to any acts or behaviour as described above objects to them or reports it or files a complaint, and this causes them to suffer any retaliatory act or behaviour, including adverse consequences to their employment or conditions of work, then such act or behaviour of retaliation would also constitute Harassment under this Policy.
- ii. For the purposes of this Policy, Harassment does not include any act of sexual harassment at the Workplace, since sexual harassment is dealt with under a separate policy of Thoughtworks titled [‘Policy on Prevention and Redressal of](#)

Sexual Harassment (“**POSH Policy**”). It may be noted that the POSH Policy is applicable to all Employees of Thoughtworks and is gender neutral.

- 2.4. **“Workplace”** includes the current office locations of Thoughtworks, from where activities, operations, and business are conducted, as well as all other premises where Thoughtworks’ activities are conducted, such as a client’s workplace location/s and in other work-related environments such as business-related social events. Any place visited by an Employee, as a result of or during the course of employment, including transportation provided by Thoughtworks and social events sponsored by Thoughtworks shall also constitute the Workplace for the purposes of this Policy. It is clarified that the Workplace includes not only physical locations but also virtual spaces where Employees interact with each other or representatives of client/s or vendor/s during the course of employment, through audio/visual, online, or other means of communication.

### 3. Governance Group

- 3.1. The Board of Directors of Thoughtworks has established a committee, hereafter called the **“Governance Group”**, for the purposes of implementing and disseminating this Policy, as well as redressing any complaints received under the Policy.
- 3.2. The members of the Governance Group are:
- Mr. Suresh Babu Kalarikkal (Head of Legal)
  - Ms. Maria Nancy (Recruiting Lead)
  - Ms. Sujitha Selvaraj (Market Unit Leader)
  - Ms. Tina Vinod (Head of Diversity, Equity & Inclusion)
  - Mr. Chirag Doshi (Head of People)
- 3.3. In addition to the Governance Group, office principals of Thoughtworks, whose names and contact details are set out in **Annexure 1** attached hereto (**“Office Principals”**), will be Thoughtworks’ representatives to Employees regarding this Policy. Office Principals will also act as points of contact to receive any complaints or answer any queries that Employees may have regarding the Policy. **Annexure 1** also contains contact information of each member of the Governance Group.
- 3.4. The Governance Group shall meet at least once every quarter to discuss matters relevant to the implementation and enforcement of this Policy.
- 3.5. The Governance Group shall advise Thoughtworks’ Board of Directors and officers on necessary steps to be taken in order for Thoughtworks to be in full compliance with all applicable laws on the subject of diversity, inclusion, and provision of equal opportunities in employment and conditions of work to all, as well as anti-Discrimination and anti-Harassment of Employees in the Workplace.

## 4. Reporting Discrimination and/or Harassment at the Workplace

- 4.1. Thoughtworks encourages reporting of all incidents of Discrimination and Harassment in the Workplace directly to any member of the Governance Group or to any of the Office Principals.
- 4.2. Thoughtworks also encourages individuals who believe that they are facing Harassment at the Workplace to promptly notify the alleged perpetrator of Harassment that their behaviour is unwelcome. Thoughtworks recognises, however, that power and status disparities between an aggrieved person and an alleged perpetrator of Harassment may make such confrontation difficult. In the event that such informal, direct communication is either ineffective or difficult, the aggrieved individual may report such Harassment to any member of the Governance Group or to any of the Office Principals. It is clarified however that such informal or direct communication is not a prerequisite to filing a complaint to the Governance Group or the Office Principals.
- 4.3. Any individual who is aggrieved under this Policy, or is subject to Discrimination and/or Harassment, must make a complaint of Discrimination and/or Harassment by reporting it directly to one of the members of the Governance Group or to one of the Office Principals. Verbal allegations or reports of Discrimination and/or Harassment must be reduced to writing by either the aggrieved individual or members of the Governance Group/Office Principals to whom the complaint is reported. In either case, the written report/complaint must be signed by the aggrieved individual.
- 4.4. At the time of filing the complaint, the aggrieved individual may provide to the Governance Group any supporting information, if it is available, as well as names and addresses of witnesses to the Harassment, if any.
- 4.5. Any person who has knowledge of incident/s of Discrimination and/or Harassment at the Workplace, or a person who has witnessed the incident/s of Discrimination and/or Harassment at the Workplace, may report such incident/s to the Office Principals or the Governance Group. The Governance Group shall, based on information received, take necessary steps to contact the alleged aggrieved individual. If such an aggrieved individual comes forward and co-operates by filing a written complaint and provides the necessary information, the Governance Group shall conduct an inquiry (in the manner set out in this Policy) and determine appropriate action to be taken to resolve the matter.
- 4.6. However, if a person who has witnessed or has knowledge of incidents of Discrimination and/or Harassment at the Workplace wishes to file a complaint with the Governance Group on behalf of an alleged aggrieved individual, they must first obtain

written consent and authorisation to do so from that aggrieved individual, which may be provided in the form of a signed letter or via e-mail.

- 4.7. Thoughtworks encourages prompt reporting of Discrimination or Harassment at the Workplace so that timely and appropriate action may be taken. Specifically, any complaint of Discrimination and/or Harassment at the Workplace must be made within three months of the incident complained about and if the complaint concerns a series of incidents, then within three months from the date of the last incident in the series. The reason for prescribing a timeframe for filing complaints is to ensure that no evidence is lost due to delay in reporting. However, owing to the sensitivity involved in such matters and because of the emotional toll the incident/s may have on an individual, the Governance Group shall have the discretion to extend the time limit for receiving complaint/s, if it is satisfied that there were circumstances which prevented the aggrieved individual from filing a complaint within the original timeframe.
- 4.8. It is clarified that complaints of Discrimination and/or Harassment at the Workplace may be made by or against any Employee, including any of the Office Principals or a member of Governance Group or Board of Directors.
- 4.9. Any incident/s of Harassment at the Workplace by an employee of a current vendor or client of Thoughtworks must be promptly notified by the aggrieved Employee to any of the members of the Governance Group or any of the Office Principals in the manner prescribed above. While Thoughtworks may not always be able to control the action of such third parties, it will take reasonable measures to redress Harassment of its Employees.
- 4.10. It is clarified that complaints of Discrimination and/or Harassment at the Workplace by transgender persons must be made to the Complaints Officer, as prescribed in Appendix 2.

## 5. Inquiry into Complaints

- 5.1. The Governance Group will inquire into any complaint of Discrimination and/or Harassment at the Workplace. The inquiry will be conducted promptly, thoroughly, and objectively, as well as in a just and fair manner.
- 5.2. 'Promptly' means as quickly as possible without affecting the quality and depth of the inquiry; and conducted and completed within a reasonable timeframe; 'thoroughly' means following all relevant information to their logical conclusion and documenting all material aspects of the inquiry; and 'objectively' means that the inquiry and questions will be unbiased, open-ended and not leading, that no person conducting the inquiry will have a conflict of interest (or the appearance of a conflict), considering the allegations and the parties involved.

- 5.3. In conducting the inquiry, at least two members of the Governance Group shall always be present. Provided however that if a complaint of Harassment and/or Discrimination in the Workplace is made by or against a member of the Governance Group, such a member shall immediately recuse themselves from the inquiry, and shall not be involved in any manner in conducting the inquiry, or making recommendations, or resolving the complaint.
- 5.4. In inquiring into a complaint, the Governance Group shall follow the principles of natural justice. Each party to the inquiry shall be given the opportunity of being heard, and shall be given the opportunity to put forward their corresponding case and defence. Parties may, if they so wish, question each other and witnesses, if any, by submitting questions in writing to the Governance Group, who will obtain responses in writing and provide the same to the examiner.
- 5.5. During the inquiry, the Governance Group shall conduct interviews with the complainant, alleged perpetrator, and witnesses (if any) and record their statements in writing. The Governance Group may summon any individual other than the parties involved, in order to conduct a fair and thorough inquiry. Interviews may be conducted in person or through video calls. The Governance Group shall share the statements with the individuals and get them to confirm the accuracy and completeness of their recorded statements by signing them or by confirming the same via e-mail.
- 5.6. The process of inquiry conducted by the Governance Group may include, without limitation, the following steps:
  - i. Ascertaining the names and positions (including designation) of the aggrieved individual and alleged perpetrator;
  - ii. Determining whether there were witnesses to the alleged incident/s of Harassment at the Workplace;
  - iii. Obtaining all facts concerning each incident of alleged Harassment;
  - iv. Determining the frequency of alleged Harassment and, if possible, the dates and locations where each of them occurred;
  - v. Allowing submission of evidence from parties;
  - vi. Determining the nature of the professional relationship between the aggrieved individual and alleged perpetrator, including degree of control and amount of interaction between them; and
  - vii. Determining whether the aggrieved individual knows of, or suspects similar conduct by the alleged perpetrator in connection with other individuals employed by Thoughtworks.
- 5.7. The Governance Group may grant interim relief to the aggrieved individual during the course of inquiry, as they deem fit and appropriate in the circumstances, to end or prevent any further Harassment or to safeguard the individual from threats, retaliation, and retribution.

- 5.8. Upon the completion of an inquiry into the complaint, the Governance Group shall prepare an inquiry report in which its findings and recommended actions will be recorded. The report prepared shall be signed by all members of the Governance Group who conducted the inquiry, and shall be forwarded to the Board of Directors of Thoughtworks.
- 5.9. The findings of the Governance Group and its recommended actions shall also be intimated to the aggrieved individual and alleged perpetrator.
- 5.10. If it is determined that Discrimination and/or Harassment at the Workplace has occurred, the alleged perpetrator will be subject to disciplinary action as deemed appropriate by the Governance Group, in accordance with the internal misconduct rules of Thoughtworks. The aggrieved individual will be informed of the disciplinary action taken. If the inquiry results in a determination that no Discrimination and/or Harassment at the Workplace has occurred, this finding also will be communicated to the aggrieved individual and alleged perpetrator.
- 5.11. In the event that an inquiry proves that an Employee was subjected to Harassment by an employee of a current vendor or client of Thoughtworks, the Governance Group shall recommend to Thoughtworks' management that all reasonable measures as appropriate in the circumstances, including practical and feasible steps to prevent further Harassment of such an Employee, be taken as soon as possible.
- 5.12. Every Employee shall cooperate with the Governance Group in its inquiry and any failure to cooperate, or any interference in the inquiry or in the work of the Governance Group, including destroying or tampering with evidence, shall be deemed a contravention of this Policy and be actionable.
- 5.13. During the inquiry process and thereafter, privacy and confidentiality of the parties involved will be maintained throughout, including information about gender identity and sexual orientation of the parties. This is to the extent deemed to be feasible and appropriate by the Governance Group under the circumstances.
- 5.14. During the inquiry, reasonable accommodation will be provided to the parties by Thoughtworks, as necessary for the parties to participate fully and effectively in the inquiry process.
- 5.15. The timeframe for resolution of complaints of Discrimination and/or Harassment at the Workplace by transgender persons shall be as prescribed in Appendix 2.

## 6. Retaliation

- 6.1. Thoughtworks will not in any way retaliate against an individual who makes a report of Discrimination and/or Harassment at the Workplace. No individual who participates in inquiries to give evidence or statements in support of a complaint made against

Discrimination and/or Harassment at the Workplace shall be subject to any unfavourable treatment or retaliatory behaviour in the conditions of their work or circumstances of employment/engagement. In particular, no individual will be threatened or intimidated, or their employment or engagement be terminated or suspended, or be disciplined, transferred, demoted, refused a promotion, or have their performance of work responsibilities obstructed, or be otherwise treated negatively as a result of raising a complaint or participating in an inquiry.

- 6.2. Retaliation will be considered a violation of this Policy and should be reported immediately to a member of the Governance Group or to one of the designated Office Principals.
- 6.3. Any Employee found to have retaliated against another individual for filing a complaint or participating in an inquiry as a witness, or reporting any act or behaviour of Discrimination and/or Harassment at the Workplace will be subject to the appropriate disciplinary action as determined by the Governance Group in accordance with internal misconduct rules of Thoughtworks. Retaliation by an employee of a current vendor or client of Thoughtworks against an Employee for filing a complaint, or participating in an inquiry as a witness, or reporting any act or behaviour of Discrimination and/or Harassment will also be actionable. The Governance Group will recommend action that they deem appropriate in the circumstances to be taken by Thoughtworks' management in accordance with the internal misconduct rules of Thoughtworks.

## 7. False Allegations

- 7.1. Upon the conclusion of an inquiry, if the Governance Group arrives at a conclusion that the aggrieved individual falsely or maliciously accused the alleged perpetrator of Discrimination and/or Harassment at the Workplace, then such a person shall be subject to appropriate disciplinary action as determined by the Governance Group in accordance with the internal misconduct rules of Thoughtworks.

## 8. Information, Education, and Training

- 8.1. The Governance Group and Office Principals shall endeavour to create awareness about, as well as sensitise Employees to be aware of issues involving, Discrimination and Harassment at the Workplace. The communication will be made accessible for the Person with Disabilities as required.
- 8.2. The Governance Group shall conduct or cause to be conducted, workshops and training programmes at regular intervals to sensitise Employees on all forms of Harassment and Discrimination at the Workplace, and it shall be the duty of each Employee to attend the same.

## 9. Amendments and Additions

- 9.1. The Governance Group shall periodically review and analyse this Policy to ensure its effectiveness in eliminating Discrimination and Harassment at the Workplace, and suggest changes and additions to the Policy, if any, to the Board of Directors of Thoughtworks.
- 9.2. The Board of Directors of Thoughtworks shall have the power to modify this Policy, including adding appendices as may be necessary to ensure greater equality and inclusiveness of individuals from under-represented minorities and enumerate their rights, in order to fully comply with applicable law in force in India at the relevant time. Any modifications and/or additions to the Policy shall be made after consultation with the Governance Group.

## 10. Non-Waiver of Statutory Rights

- 10.1. Nothing contained in this Policy shall prejudice any right available to any Employee or individual or prevent them from seeking any legal remedy under applicable law in relation to Discrimination and/or Harassment at the Workplace.
- 10.2. This Policy does not constitute a waiver of any of the statutory and common law rights of Thoughtworks or its Employees and it shall be open to both parties to exercise any of their legal rights.

## 11. Acknowledgement by Employees

- 11.1. The success of this Policy depends, in significant part, upon the understanding and cooperation of all Thoughtworks Employees. Therefore, each Employee of Thoughtworks shall sign an acknowledgment, as and when required by the Governance Group. The form of the acknowledgment will be provided by the Governance Group. The acknowledgment may be signed physically or digitally by Employees, as notified by the Governance Group, keeping in mind what is appropriate and feasible in the circumstances.

## 12. Publication

- 12.1. Thoughtworks shall publish this Policy on its website, as well as in prominent places in all its office locations and premises.

# Annexure 1 – Governance Group and Office Principals

## Governance group members

Mr. Suresh Babu Kalarikkal (Complaints Officer)	<a href="mailto:sbkalarikkal@thoughtworks.com">sbkalarikkal@thoughtworks.com</a>
Ms. Maria Nancy (Recruiting Lead)	<a href="mailto:marian@thoughtworks.com">marian@thoughtworks.com</a>
Ms. Sujitha Selvaraj (Market Unit Leader)	<a href="mailto:sujitha.selvaraj@thoughtworks.com">sujitha.selvaraj@thoughtworks.com</a>
Ms. Tina Vinod (Advisory Member)	<a href="mailto:tvinod@thoughtworks.com">tvinod@thoughtworks.com</a>
Mr. Chirag Doshi (Advisory Member)	<a href="mailto:chirag@thoughtworks.com">chirag@thoughtworks.com</a>

## Office Principals

Thoughtworks Bengaluru – Koramangala <ul style="list-style-type: none"><li>Ankur Dang</li></ul>	<a href="mailto:ankurdan@thoughtworks.com">ankurdan@thoughtworks.com</a>
Thoughtworks Bengaluru – Mahadevapura <ul style="list-style-type: none"><li>Sabitha Rajat</li></ul>	<a href="mailto:sabitha@thoughtworks.com">sabitha@thoughtworks.com</a>
Thoughtworks Chennai <ul style="list-style-type: none"><li>Gayathri Pandian</li></ul>	<a href="mailto:gayathri.pandian@thoughtworks.com">gayathri.pandian@thoughtworks.com</a>
Thoughtworks Coimbatore <ul style="list-style-type: none"><li>Sujitha Selvaraj</li></ul>	<a href="mailto:sujithas@thoughtworks.com">sujithas@thoughtworks.com</a>
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Thoughtworks Hyderabad <ul style="list-style-type: none"><li>Ramprasad Yadav</li></ul>	<a href="mailto:ramyadav@thoughtworks.com">ramyadav@thoughtworks.com</a>
Thoughtworks Pune and Mumbai <ul style="list-style-type: none"><li>Gyanendra Yadav</li></ul>	<a href="mailto:gyaneny@thoughtworks.com">gyaneny@thoughtworks.com</a>

# Appendix 1

## Equal Opportunities to Persons with Disabilities and their Rights

1. The contents of this Appendix are in addition to and not in limitation of Thoughtworks' Policy of Equal Opportunity, Non-Discrimination and Anti-Harassment at the Workplace. They prescribe certain specific rights and responsibilities of persons with disabilities, as defined in and by the Rights of Persons with Disabilities Act, 2016 ("**RPWD Act**"), and the responsibilities of Thoughtworks towards such persons, as set out in the RPWD Act and rules made there under from time to time ("**RPWD Rules**").
2. To make its workplaces equitable, reflective, and inclusive, Thoughtworks will strive, where possible, to go beyond complying with the requirements mandated by the RPWD Act and RPWD Rules.
3. Thoughtworks is committed to disability inclusion in our workplace. We will work towards ensuring that its office spaces (both physical and virtual) are, as may be reasonably required, accessible and inclusive for all personnel. In order to do so, Thoughtworks is in the process of identifying opportunities to make meetings of Thoughtworks' personnel more accessible and inclusive, as well as reviewing internal and external communications to identify opportunities for improvements relating to accessibility.
4. Thoughtworks will make efforts to scale up recruitment and retention of persons with disabilities, including providing applicable training, as well as preferences in transfer and postings and providing special leave, where applicable and feasible.
5. Thoughtworks will provide reasonable accommodation at the Workplace as may be required by Employees to effectively discharge their duties. In providing accessibility to persons with disabilities, Thoughtworks will, to the best extent possible, comply with applicable standards as prescribed in the RPWD Act and RPWD Rules from time to time. For the purposes of this Policy (including Appendix 1), 'reasonable accommodation' shall mean necessary and appropriate modifications and adjustments, without disproportionate or undue burden, to ensure that all Employees can enjoy or exercise their rights equitably.
6. Thoughtworks will also provide reasonable accommodation at the Workplace to individuals applying to work at Thoughtworks referred to as "**Candidates**", as may be required. For Candidates with disability to participate effectively in ThoughtWorks' recruitment process, if there is a need for a reasonable accommodation, the candidate must make a request in writing to the respective POC recruiter, containing details of their requirement/s and reason/s, at the time of submitting their job application. Thoughtworks will make efforts, to the best of its ability, to support the Candidate and provide or arrange for reasonable accommodation. Thoughtworks will keep the candidature open until the reasonable accommodation request is addressed.

7. An Employee of Thoughtworks who seeks reasonable accommodation at the Workplace, must submit a written request for the same via e-mail to the Office Principal of their respective home office location, with a copy marked to the Liaison Officer (defined below).
8. All e-mail requests from Thoughtworks' Employees for reasonable accommodation must include the following information:
  - a. Name and function of the Employee requesting accommodation;
  - b. Mode of communication preferred by the Employee (mobile - call/text/instant messages, e-mail, etc.);
  - c. Nature of disability or specific limitation;
  - d. Type of accommodation requested;
  - e. Frequency of accommodation needed; and
  - f. Approximate cost of the accommodation, with an explanation of how the accommodation will allow the performance of essential functions of the position or the participation in a programme or activity.
9. Upon submission of the request, the designated Office Principal will acknowledge receipt of the same within 7 days.
10. Thoughtworks will review the request for reasonable accommodation and will convey its decision (approval or rejection) in writing to the requester within a period of 15 days.
11. If the request for reasonable accommodation is approved, the designated Office Principal will notify the requester.
12. In case of extended leave, Thoughtworks, at its sole discretion, will take a decision based on the needs of the Employee on a case to case basis.
13. Based on the nature and cost of reasonable accommodation to be made or provided, Thoughtworks will inform the requester about the timelines for provision/availability of the reasonable accommodation. Broadly - (a) Any assistive device owned by Thoughtworks will be provided by Thoughtworks as reasonable accommodation; (b) In cases of assistive devices which are not owned by Thoughtworks, Thoughtworks and the Employee will take a joint decision of how the reasonable accommodation request will be addressed.
14. If the request is denied, the requester may appeal in writing to the Governance Group within 30 days of receiving the notice of rejection. The Governance Group will prioritise and treat the appeal as a complaint, and proceed as prescribed in Paragraph 5 of the Policy (*Inquiry into Complaints*).
15. In order to provide a recruitment opportunity at Thoughtworks to a Candidate and/or provide reasonable accommodation to Employees, Thoughtworks may, at its discretion, seek the following documents. A physical or scanned copy of the certificate/written

recommendation may be sent via e-mail to the office principal or uploaded to a database indicated by Thoughtworks:

- a. Disability certificate from the Candidate or Employee with disability. The form and content of the disability certificate provided must conform to the details prescribed by the RPWD Act and RPWD Rules.  
or
  - b. Medical certificate/doctor's written recommendation for requests of reasonable accommodation from a Candidate or an Employee without disability.
16. In reference to point no. 13, at the time of an Employee's exit from Thoughtworks, regardless of the reason, if the assistive device is owned by Thoughtworks the Employee needs to return it to Thoughtworks. In a situation where it has been specifically procured by the individual and the cost reimbursed by Thoughtworks, the decision to return will be a joint decision taken by the Employee and Thoughtworks.
17. It is clarified that no person shall be compelled by Thoughtworks to partly or fully pay the costs incurred for any reasonable accommodation.
18. Thoughtworks has designated Sujitha Selvaraj as the "**Liaison Officer**", who will oversee and manage aspects relating to recruitment of persons with disabilities, as and when it occurs, as well as deal with provision of facilities and amenities for such Employees. The Liaison Officer may be contacted at [sujitha.selvaraj@thoughtworks.com](mailto:sujitha.selvaraj@thoughtworks.com)
19. Thoughtworks will maintain the records listed below and make them available for inspection to the authorities under the RPWD Act.
- a. The number of persons with disabilities who are employed by Thoughtworks and the date from when they are employed;
  - b. The name, gender, and address of persons with disabilities;
  - c. The nature of disability of such persons;
  - d. The nature of work being rendered by such employed persons with disability; and
  - e. The kind of facilities (including reasonable accommodation) being provided by Thoughtworks.
20. In order for Thoughtworks to report the above-mentioned details accurately, all Employees are encouraged to fully, voluntarily and transparently disclose to Thoughtworks all necessary information relating to their disability/ies as Thoughtworks may seek from time to time.

## Appendix 2

### Equal Opportunities to Transgender Persons and Their Rights

1. The contents of this Appendix are in addition to and not in limitation of Thoughtworks' Policy of Equal Opportunity, Non-Discrimination and Anti-Harassment at the Workplace. They prescribe certain specific rights granted to a transgender person, as defined by the Transgender Persons (Protection of Rights) Act, 2019 ("**TPPR Act**"), shall be dealt with as per the TPPR Act and the rules made thereunder from time to time ("**TPPR Rules**").
2. A transgender person shall have a right to be recognised as such, and shall have a right to self-perceived gender identity.
3. Thoughtworks has designated Mr. Suresh Babu Kalarikkal as the Complaints Officer, to deal with complaints relating to violation of the provisions of the TPPR Act and this Policy. The Complaints Officer shall inquire into complaints received within fifteen days of receiving the complaint and grievances should be resolved within thirty days from the date when the complaint was filed. Where appropriate action has not been taken in accordance with the above timeframes, the Board of Directors shall take action immediately.
4. In keeping with its commitment to make its workplaces equitable, reflective, and inclusive, Thoughtworks will provide reasonable facilities to transgender persons employed by or working at Thoughtworks to enable them to discharge their duties effectively, including gender-neutral washrooms.
5. All applicable rules and regulations regarding the service conditions of its Employees shall apply, without exclusion, to transgender persons employed by Thoughtworks.
6. Thoughtworks shall maintain confidentiality of the gender identity of Employees.
7. Thoughtworks will ensure the safety and security of its transgender Employees in Thoughtworks offices, as required under applicable law.
8. Thoughtworks aspires to be an employer of choice for all and will strive to create an inclusive & safe space for the LGBTQIA+ community.